

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

JOHNNY THOMAS ORTIZ II; JIMMIE
GREGORY ROGERS JR.; and WELDON
MURPHY

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS; ALAN HIRSCH, in his official
capacity as Chair of the North Carolina
State Board of Elections; JEFF CARMON
III, in his official capacity as member of the
North Carolina State Board of Elections;
STACY EGGERS IV, in his official capacity
as member of the North Carolina State
Board of Elections; KEVIN N. LEWIS, in his
official capacity as member of the North
Carolina State Board of Elections;
SIOBHAN O'DUFFY MILLEN, in her
official capacity as member of the north
Carolina State Board of Elections; and
KAREN BRINSON BELL, in her official
capacity as Executive Director of the North
Carolina State Board of Elections,

Defendants.

Civil Action No. 5:24-cv-00420-BO

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF
IN SUPPORT OF PLAINTIFF'S EMERGENCY MOTION
FOR PRELIMINARY INJUNCTION**

NOW COME non-parties the Republican National Committee ("RNC") and the North Carolina Republican Party ("NCGOP") (collectively "Republican Amici") and move this Court for leave to file an *amicus curiae* brief in support of Plaintiffs' Emergency Motion for Preliminary Injunction. Republican Amici's proposed *amicus curiae* brief is an attachment to this motion.

Republican Amici's proposed *amicus* brief provides value to the Court by providing additional factual background and legal analysis in support of Plaintiffs' motion. The proposed *amicus* brief provides additional detail regarding the factual circumstances leading to, and occurring after, Defendants' denial of the Justice For All Party's petition for formation of a new political party. It also provides additional legal argument as to why Defendants' denial of the Justice For All Party's petition violates Plaintiffs' constitutional rights.

Both Plaintiffs and Defendants consent to the filing of Proposed Amici's *amicus curiae* brief.

Dated: July 29, 2024

Respectfully submitted,

/s/ John E. Branch, III

John E. Branch, III

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*Attorneys for Proposed Amicus Curiae the
Republican National Committee and the North
Carolina Republican Party*

CERTIFICATE OF SERVICE

I certify that on this 29th day of July 2024, I caused the foregoing document to be filed and served on all counsel of record by operation of the CM/ECF system for the United States District Court for the Eastern District of North Carolina.

/s/ John E. Branch, III

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**CERTIFICATE OF COMPLIANCE WITH THE HONORABLE TERRENCE W.
BOYLE'S PRACTICE PREFERENCES**

I certify that paper copies of Republican Amici's Motion for Leave to File *Amicus Curiae* Brief, and corresponding attachments, will be delivered to the Raleigh Clerk's Office, U.S. District Court, Eastern District of North Carolina, 310 New Bern Avenue, Room 574, Raleigh NC 27601, via courier service to comply with The Honorable Terrence W. Boyle's Practice Preferences.

This the 29th day of July 2024.

/s/ John E. Branch, III

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